

Exhibit 4

From: [Lobel, Louis](#)
To: [Edwards, Jeremy](#); [McTigue, Thomas](#); [Maddox, Steven](#); [Rebekah Conroy](#)
Cc: [Wiesen, Daryl L](#); [Daughtrey, Natasha E](#); [Lwalsh@walsh.Law](#); [Selina Ellis](#); [Christine P. Clark](#); [BTroyan@walsh.law](#); [Garrison, Brett](#)
Subject: RE: ProAir HFA - 23-cv-20964 - Teva's request to postpone its answers to counterclaims
Date: Wednesday, January 24, 2024 1:19:08 PM
Attachments: [image008.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[2024.01.24 LMW Letter to J. Hammer re extension_GPredline.docx](#)

Jeremy,

Thank you for your response. We do not see the issues as related. As we have already indicated, we believe discovery on antitrust issues should be bifurcated whether or not Amneal's antitrust counterclaims survive Teva's motion. And your request regarding Amneal's 12(c) motion does not make sense since Motions for Judgment on the pleadings may only be filed after pleadings are closed pursuant to Rule 12(c).

If Amneal is requiring such conditions to waive its objection, we will simply note that Amneal objects. We have updated the draft letter attached, noting that Amneal objects and plans to respond to the request by January 25, 2024. We do not agree to include an entire "Amneal's Request" section as this is not a joint letter.

Please let us know by 5 pm today if Amneal has changed its position. Otherwise, we will get this on file.

Best,
Louis

Louis L. Lobel
he/him/his



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From: Edwards, Jeremy <Jeremy.Edwards@procopio.com>
Sent: Wednesday, January 24, 2024 10:32 AM
To: Lobel, Louis <LLobel@goodwinlaw.com>; McTigue, Thomas <TMcTigue@goodwinlaw.com>; Maddox, Steven <Steven.Maddox@procopio.com>; rconroy@stoneconroy.com
Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E

<NDaughtrey@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law; Garrison, Brett <Brett.Garrison@procopio.com>

Subject: RE: ProAir HFA - 23-cv-20964 - Teva's request to postpone its answers to counterclaims

EXTERNAL

Louis,

Thank you for your response.

Amneal would not object to Teva's request, provided that Teva agrees that it will not rely on the pendency of Teva's Rule 12 motion and/or the corresponding pendency of Teva's answer to any of Amneal's counterclaims to seek to delay, prevent, or limit (a) briefing or disposition of Amneal's 12(c) motion or (b) discovery in this case under the local rules or the Federal Rules.

Please let us know Teva's position on these items by the end of the day today.

Sincerely,

Jeremy

JEREMY J. EDWARDS

PARTNER

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From: Lobel, Louis <LLobel@goodwinlaw.com>

Sent: Tuesday, January 23, 2024 5:28 PM

To: Edwards, Jeremy <Jeremy.Edwards@procopio.com>; McTigue, Thomas <TMcTigue@goodwinlaw.com>; Maddox, Steven <Steven.Maddox@procopio.com>; rconroy@stoneconroy.com

Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E <NDaughtrey@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law; Garrison, Brett <Brett.Garrison@procopio.com>

Subject: RE: ProAir HFA - 23-cv-20964 - Teva's request to postpone its answers to counterclaims

*** EXTERNAL EMAIL - Please use Caution. ***

Jeremy,

Teva will be moving to dismiss Amneal's Counterclaims 1-10, which includes all delisting

counterclaims. Please let us know by 12 pm EST tomorrow if this information changes Amneal's position objecting to Teva's request that the time to answer Defendants' counterclaims not dismissed by the Court be extended until 14 days after the Court decides Teva's motion. If not, we will have additional edits to the letter which we will send you tomorrow.

Best,
Louis

Louis L. Lobel

he/him/his



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From: Edwards, Jeremy <Jeremy.Edwards@procopio.com>

Sent: Tuesday, January 23, 2024 3:29 PM

To: McTigue, Thomas <TMcTigue@goodwinlaw.com>; Maddox, Steven
<Steven.Maddox@procopio.com>; rconroy@stoneconroy.com

Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E
<NDaughtrey@goodwinlaw.com>; Lobel, Louis <LLobel@goodwinlaw.com>; Lwalsh@walsh.Law;
Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law;
Garrison, Brett <Brett.Garrison@procopio.com>

Subject: ProAir HFA - 23-cv-20964 - Teva's request to postpone its answers to counterclaims

EXTERNAL

Tom,

Amneal objects and requests that you submit the letter incorporating our changes. Redline attached.

Further, please be advised that Amneal intends to move for judgment on the pleadings on its delisting counterclaims, and do so promptly. Accordingly, please advise whether Teva will agree to answer at least Amneal's delisting counterclaims by the current deadline of January 26, 2024.

Also, so that we can fully understand Teva's request, please advise by noon eastern time tomorrow *which* specific counterclaims Teva intends to move to dismiss. Thank you.

Sincerely,

Jeremy

JEREMY J. EDWARDS

PARTNER

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From: McTigue, Thomas <TMcTigue@goodwinlaw.com>

Sent: Monday, January 22, 2024 7:24 PM

To: Maddox, Steven <Steven.Maddox@procopio.com>; rconroy@stoneconroy.com; Edwards, Jeremy <Jeremy.Edwards@procopio.com>

Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E <NDaughtrey@goodwinlaw.com>; Lobel, Louis <LLobel@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law

Subject: RE: Teva v. Amneal, 23-cv-20964 (ProAir HFA) - Rule 26(f) Conference

*** EXTERNAL EMAIL - Please use Caution. ***

Counsel,

Following up on today's meet and confer, Teva intends to file the attached letter requesting that the time to answer Defendants' counterclaims not dismissed by the Court be extended until 14 days after the Court decides Teva's motion. Please let us know if Defendants object by 4 PM (ET) tomorrow (1/23) so that we may timely file.

Regards,

Tom

Thomas McTigue



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From: McTigue, Thomas

Sent: Friday, January 19, 2024 4:06 PM

To: 'Maddox, Steven' <Steven.Maddox@procopio.com>; rconroy@stoneconroy.com; Edwards, Jeremy <Jeremy.Edwards@procopio.com>

Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E <NDaughtrey@goodwinlaw.com>; Lobel, Louis <LLobel@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law

Subject: RE: Teva v. Amneal, 23-cv-20964 (ProAir HFA) - Rule 26(f) Conference

Counsel,

In advance of the parties' Rule 26(f) conference on Monday, please find attached a draft Joint Discovery Plan. This is an initial draft meant to aid the parties' discussion. Please note that the JDP is subject to final approval by Teva and Teva reserves the right to make revisions.

Regards,

Tom

Thomas McTigue



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From: Maddox, Steven <Steven.Maddox@procopio.com>

Sent: Thursday, January 11, 2024 10:04 AM

To: McTigue, Thomas <TMcTigue@goodwinlaw.com>; rconroy@stoneconroy.com; Edwards, Jeremy <Jeremy.Edwards@procopio.com>

Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E <NDaughtrey@goodwinlaw.com>; Lobel, Louis <LLobel@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law

Subject: RE: Teva v. Amneal, 23-cv-20964 (ProAir HFA) - Rule 26(f) Conference

EXTERNAL

Counsel:

We are available at 3:00 on the 17th.

Please send a calendar invite.

STEVEN MADDOX
PARTNER

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From: McTigue, Thomas <TMcTigue@goodwinlaw.com>
Sent: Wednesday, January 10, 2024 7:44 PM
To: rconroy@stoneconroy.com; Maddox, Steven <Steven.Maddox@procopio.com>; Edwards, Jeremy <Jeremy.Edwards@procopio.com>
Cc: Wiesen, Daryl L <DWiesen@goodwinlaw.com>; Daughtrey, Natasha E <NDaughtrey@goodwinlaw.com>; Lobel, Louis <LLobel@goodwinlaw.com>; Lwalsh@walsh.Law; Selina Ellis <SEllis@walsh.law>; Christine P. Clark <cclark@walsh.law>; BTroyan@walsh.law
Subject: Teva v. Amneal, 23-cv-20964 (ProAir HFA) - Rule 26(f) Conference

*** EXTERNAL EMAIL - Please use Caution. ***

Counsel,

In light of the Court setting the Initial Scheduling Conference for February 7, 2024, the parties are required to hold a Rule 26(f) conference no later than January 17, 2024 pursuant to L. Civ. R. 26.1(b) (2). Accordingly, please confirm Defendants' availability between 2-4 PM (ET) on January 17 for the Rule 26(f) conference.

In the event the parties require more time following this initial Rule 26(f) conference, the parties can schedule a follow-up.

Regards,

Tom

Thomas McTigue



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Thu Jan 11 2024 07:04:06

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